



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 1, 2015

ABRAHAM ANTUN, TREASURER
NEW MILLENNIUM PAC
700 13TH STREET NW., SUITE 600
WASHINGTON, DC 20005

Response Due Date
03/09/2015

IDENTIFICATION NUMBER: C00349233

REFERENCE: 30 DAY POST-GENERAL REPORT (10/16/2014 - 11/24/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Your report discloses a reimbursement(s) for "Reimbursement - Travel, Catering, Donor Gifts & Event Expenses" to "Connectiva Inc.", an apparent corporation. This appears to be an in-kind contribution made on behalf of your committee, as the original payment for the goods and services has been made by an entity other than your committee. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, salaries, telephone service, office equipment and supplies.

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), unaffiliated political committee, or any other entity would be considered an in-kind contribution from that person, committee or entity, and would be subject to the disclosure requirements of 52 U.S.C. §30104(b)(3) (formerly 2 U.S.C. §434(b)(3)) and 11 C.F.R. §104.3, and the limitations and prohibitions of 52 U.S.C. §30116 and 30118 (formerly 2 U.S.C. §§441a and 441b).

Please clarify the reimbursement(s) for apparent administrative expenses made to a corporation by your committee and provide the date(s) the goods/services were provided.

2. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b)

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of your report to clarify the following description(s): "Reimbursement - Travel, Catering, Donor Gifts & **Event Expenses**." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1164.

Sincerely,

A handwritten signature in black ink that reads "Nicole Miller". The signature is written in a cursive, flowing style.

Nicole Miller
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division